

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

NELSON L. BRUCE,

Plaintiff,

v.

LEXISNEXIS RISK SOLUTIONS INC., *et al.*

Defendants.

Case No.: 2:22-cv-02211-BHH-MGB

**DEFENDANT LEXISNEXIS RISK SOLUTIONS INC.'S LOCAL RULE
26.01 INITIAL DISCLOSURES**

Defendant LexisNexis Risk Solutions Inc. ("LNRS"), by counsel, hereby specially appears in this case to move the Court to set aside the default entered on March 29, 2023. LNRS makes the following disclosures required by Rule 7.1 of the Federal Rules of Civil Procedure and Local Rule 26.01.

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

LNRS is not aware of any persons or legal entities with a subrogation interest in this case.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

Plaintiff's Amended Complaint requests a trial by jury.

(C) State whether the party submitting these responses is a publicly owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

LNRS is not a publicly owned company, nor does it own ten percent or more of the stock of any publicly owned company. LNRS is a wholly owned subsidiary of LexisNexis Risk Assets Inc. LexisNexis Risk Assets Inc. is a wholly owned subsidiary of LexisNexis Risk Holdings Inc. LexisNexis Risk Holdings Inc. is a wholly owned subsidiary of RELX Inc. RELX Inc. is a wholly owned subsidiary of RELX US Holdings Inc. The ultimate parent of RELX US Holdings Inc. is RELX Group plc, which is owned by RELX PLC (LSE: REL; NYSE: RELX).

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

LNRS was not properly served. See LNRS' Mot. to Set Aside Default. For that reason, this Court lacks personal jurisdiction over LNRS.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

LNRS does not contend there are any related actions to this case.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

LNRS does not contend it is improperly identified. However, LNRS was not properly served. See LNRS' Mot. to Set Aside Default. For that reason, this Court lacks personal jurisdiction over LNRS.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

While maintaining that LNRS is not liable to Plaintiff for the claims at issue in this case and that this Court lacks personal jurisdiction over LNRS because of the improper service, LNRS does not contend that some other person or legal entity is liable to Plaintiff in this matter.

This the 31st day of March, 2023.

/s/ William J. Farley III

William J. Farley III

Fed. Bar No. 12004

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Counsel for Defendant LexisNexis Risk Solutions Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of March 2023, a true and correct copy of the foregoing was filed electronically via the Court's CM/ECF system and also sent via U.S. Mail to the following:

Nelson L. Bruce
PO Box 3345
Summerville, SC 29484
Pro Se Plaintiff

/s/William J. Farley III
William J. Farley III